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March 21, 2019

BY ECF

Honorable Gary R. Brown
 United States Magistrate Judge
 Eastern District of New York
 100 Federal Plaza
 Central Islip, New York 11722

Re: *Jackson v. Nassau County, et al.*, 18 CV 3007 (JS) (GRB)

Your Honor:

I represent plaintiff in the above-referenced wrongful conviction matter. I write on behalf of the parties pursuant to Fed. R. Civ. P. 26(f) to respectfully propose the following jointly-developed discovery plan for the Court's review and endorsement:

Phase I: Pre-Settlement Discovery

Service of Rule 26(a) Initial Disclosures and HIPAA-Compliant Releases by	4/16/19
Completion of Phase I Discovery	4/30/19

Phase II: Discovery and Motion Practice

First Requests for Production of Documents and Interrogatories to be served by	5/3/19
<i>Responses to these Requests</i>	6/3/19
All Fact Discovery Completed by	11/15/19
Plaintiff's Deposition by	7/9/19
Defendants' Depositions by	9/2/19
Third-party Depositions by	10/2/19
Deadline for Discovery Requests	10/9/19
Exchange of Expert Reports	11/15/19
Expert Depositions to be Completed by	12/30/19

Hon. Gary R. Brown
Mar. 21, 2019

Accordingly, if it should please the Court, the parties respectfully request that the Court adopt their proposed schedule.

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: All Counsel